

Before the
COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
) WT Docket No. 10–4
Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the)
Commission’s Rules to Improve Wireless Coverage) RM-11784
Through the Use of Signal Boosters)

To: The Commission

April 3, 2017

REPLY COMMENTS OF STAIRCASE 3, INC, D/B/A REPEATERSTORE AND RSRF

Staircase 3, Inc., d/b/a RepeaterStore and RSRF (“Staircase 3”), hereby submits these reply comments to the Wireless Telecommunications Bureau’s (“Bureau”) Public Notice seeking comment on the potential elimination of the personal use restriction on cellular signal boosters.

In its recent filing, Staircase 3 fully agreed with the benefits of the removing the “personal use” restriction for both *wideband* and *provider-specific* consumer signal boosters.

In that filing, Staircase 3 noted that the only objection to removing the “personal use” restriction came from Nextivity, Inc., a manufacturer that focuses on building provider-specific signal boosters. In their comments, Nextivity, Inc. suggests that intermodulation effects caused by amplification of uplink signals by wideband boosters might cause interference for other carrier’s downlink signals, and that the proliferation of boosters would increase congestion on cell towers.

On the matter of the claimed downlink intermodulation issues it's important to note that not a single wireless carrier has mentioned any such issues. If there were a noticeable increase in coverage complaints from buildings where boosters are installed, one would expect that wireless carriers would be the first to notice and bring attention to the issue. However, that has not been the case. And it is not surprising. A

wideband booster, by its nature, amplifies signal for all wireless carriers in a particular geographic area. Any users who might experience those purported intermodulation effects would also be experiencing improved coverage as a result of the deployment of the wideband booster.

In its most recent filings, Nextivity, Inc. states:

“The rule changes proposed by Wilson, however, would enable consumers to install Wideband boosters in any application and any environment. The rules would enable a “plug and play” approach with no professional installation or wireless carrier involvement.”

These comments fail to acknowledge that wideband consumer boosters have been installed for the last three years under that exact same “plug and play” approach. Those deployments have occurred with the acknowledgement and support of wireless carriers; enabling the same kinds of deployments for small businesses would empower thousands of employers and employees across the country who struggle with cell coverage issues at their places of business.

Furthermore, Nextivity, inc. recommends consideration of the following fact:

“Increasing the number of users on a cell base station will result in degradation in user experience if the number of users crosses a technology and environment dependent threshold.”

However, this problem is not unique to wideband boosters. Provider-specific boosters will degrade user experience in exactly the same manner. As indeed will the sale of more cellular devices generally.

Staircase 3 reminds the commission that Nextivity’s stands alone in its opposition to removal of the “personal use” restriction. Consideration should be given to their significant material interest in seeing regulations relaxed for their own devices but not for those of their competitors.

Were Nativity’s comments supported by evidence of issues by the wireless carriers themselves, perhaps they might warrant some consideration. But given that no carrier has opposed the removal of personal use

restriction for provider-specific or wideband boosters, we urge the commission to remove the restriction for both classes of devices and enable small businesses across the country to access the technology that consumers have had access to for the past three years.

Respectfully submitted,

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